

PERKINS COIE LLP  
 Paul S. Jasper, Bar No. 200138  
 Amir Gamliel, Bar No. 268121  
 Angie Young Kim, Bar No. 270503  
 505 Howard Street, Suite 1000  
 San Francisco, CA 94105  
 Telephone: 415.344.7000  
 Email: PJasper@perkinscoie.com  
 Email: AGamliel@perkinscoie.com  
 Email: AngieKim@perkinscoie.com

Andrew H. Sherman (admitted pro hac vice)  
 Boris I. Mankovetskiy (admitted pro hac vice)  
 SILLS CUMMIS & GROSS P.C.  
 One Riverfront Plaza  
 Newark, New Jersey 07102  
 Telephone: 973.643.7000  
 Email: ASherman@sillscummis.com  
 Email: BMankovetskiy@sillscummis.com

*Co-Counsel to the WHC Liquidation Trust*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN JOSE DIVISION**

JEREMY ROSENTHAL, AS LIQUIDATION  
 TRUSTEE OF THE WHC LIQUIDATION  
 TRUST,

Plaintiff,

v.

HALSEN HOLDINGS, LLC, a California  
 limited liability company; SOUTH TEXAS  
 ASSOCIATES & RESOURCES, a California  
 corporation; PENINSULA HEALTHCARE  
 MANAGEMENT LLC, a Nevada limited  
 liability company; DANIEL BROTHMAN, an  
 individual; EDITH BROTHMAN, an  
 individual; STACY SEAN FOWLER, an  
 individual; EDMUND C. KING, an  
 individual; and DOES 1 through 100,  
 inclusive,

Defendants.

Case No. 5:23-cv-06216-EKL

**STIPULATION TO CONTINUE CASE  
 MANAGEMENT CONFERENCE  
 STATEMENT DEADLINE &  
 [PROPOSED] ORDER**

**THIRD REQUEST FOR EXTENSION**

Courtroom: 7  
 Judge: Eumi K. Lee

Complaint Filed: December 1, 2023  
 Trial Date: None

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiff Jeremy Rosenthal (“Plaintiff”), in his capacity as the Liquidation Trustee of the WHC Liquidation Trust and representative of the bankruptcy estates of Watsonville Hospital Corporation (“WHC”) and certain of its affiliates (collectively with WHC, the “Debtors”) and Defendants Halsen Holdings, LLC, South Texas Associates & Resources, Peninsula Healthcare Management LLC, Daniel Brothman, Edith Brothman, Stacy Sean Fowler, and Edmund C. King (“Defendants”) (collectively, the “Parties”) hereby stipulate and agree as follows:

WHEREAS, on August 20, 2024, this Court reassigned this case to the Honorable Eumi K. Lee, reset the deadline for the Parties to file their Joint Case Management Conference Statement from August 22, 2024 to September 16, 2024, and vacated the Initial Case Management Conference (“CMC”) set for September 5, 2024 (Dkt. 37);

WHEREAS, the Parties engaged in a mediation on August 28, 2024 and reached a settlement in principle subject to documentation and obtaining approval of the proposed settlement by either (a) the United States Bankruptcy Court for the Northern District of California in Case No. 21-51477 (jointly administered) or (b) the Oversight Committee appointed pursuant to the plan of liquidation confirmed in the Debtors’ chapter 11 bankruptcy cases;

WHEREAS, the Parties request an extension of the Joint Case Management Conference Statement deadline until October 16, 2024 in order to finalize the settlement and to conserve the time and resources of the Court and the Parties;

WHEREAS, on December 4, 2024, this Court entered an Initial Scheduling Order (Dkt. 5), scheduling the Initial CMC for March 5, 2024;

WHEREAS, on January 18, 2024, the clerk reset the date of the CMC for March 14, 2024 following reassignment (Dkt. 14);

WHEREAS, on February 5, 2024, the Court granted, as modified, the Parties’ joint request for extension of case management deadlines, setting the CMC to May 16, 2024 (Dkt. 16);

WHEREAS, on May 7, 2024, the clerk continued the CMC to June 13, 2024 (Dkt. 27);

WHEREAS, on June 11, 2024, the Court granted a stipulation to continue the Case Management Conference to September 5, 2024 (Dkt. 33);

1 WHEREAS, there have been no other time modification requests in this case;

2 WHEREAS, the requested time modification would not have any effect on the schedule for  
3 the case because the Court: (1) vacated all pretrial conference and trial dates before December 4,  
4 2024 (Dkt. 37); and (2) ordered that and all pretrial conference and trial dates after December 4,  
5 2024 will remain in place (Dkt. 37) and no pretrial conference or trial dates have been set after  
6 December 4, 2024;

7 WHEREAS, the Court has not stated that no further extensions will be granted;

8 WHEREAS, Plaintiff has filed a Declaration in support of this Stipulation as required under  
9 Local Rule 6-2(a).

10 **IT IS SO STIPULATED.**

11 Dated: September 6, 2024

**PERKINS COIE LLP**

13 By: /s/ Paul S. Jasper

14 Paul S. Jasper, Bar No. 200138  
PJasper@perkinscoie.com  
15 505 Howard Street, Suite 1000  
San Francisco, CA 94105  
16 Telephone: 415.344.7000

17 *Counsel to Plaintiff*  
Jeremy Rosenthal, as Liquidation  
18 Trustee of the WHC Liquidation Trust

19 Dated: September 6, 2024

**KAUFMAN DOLOWICH, LLP**

21 By: /s/ Tad A. Devlin

22 Tad A. Devlin, Bar No. 190355  
tdevlin@kaufmandolowich.com  
23 Marcus M. Dong, Bar No. 251723  
mdong@kaufmandolowich.com  
24 425 California Street, Suite 2100  
San Francisco, CA 94104  
25 Telephone: 415.926.7600

26 *Counsel to Defendants*  
Halsen Holdings, LLC, South Texas  
27 Associates & Resources, Peninsula  
Healthcare Management, LLC, Daniel  
28 Brothman, Edith Brothman, Stacy Sean  
Fowler, and Edmund C. King

**Attestation Pursuant to Civil Local Rule 5-1(i)(3)**

I, Paul S. Jasper, attest that concurrence in the filing of this document has been obtained from any other signatory to this document.

Dated: September 6, 2024

/s/ Paul S. Jasper

Paul S. Jasper, Bar No. 200138

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2024

\_\_\_\_\_  
Hon. Eumi K. Lee

United States District Judge